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f/k/a Facebook, Inc.; Facebook Holdings, LLC;
Facebook Operations, LLC; Meta Payments, Inc.
f/k/a Facebook Payments, Inc.; Meta Platforms
Technologies, LLC f/k/a Facebook Technologies,
LLC; Instagram, LLC; and Siculus LLC f/k/a
Siculus, Inc.*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

This Document Relates To:

**DECLARATION OF ASHLEY M.
SIMONSEN IN SUPPORT OF
DEFENDANTS' MOTION TO STRIKE**

*Breathitt County Board of Education v. Meta
Platforms, Inc., et al. No. 23-cv-01804*

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

*Charleston County School District v. Meta
Platforms, Inc., et al. No. 23-cv-04659*

*DeKalb County School District v. Meta
Platforms, Inc., et al. No. 25-cv-02310*

Date: November 19, 2025
Time: 2:00 PM
Place: Courtroom 1, 4th Floor

*Board of Education of Harford County v. Meta
Platforms Inc., et al., No. 23-cv-03065*

*Irvington Public Schools v. Meta Platforms, Inc., et
al. No. 23-cv-01467*

*Tucson Unified School District v. Meta Platforms,
Inc., et al., No. 24-cv-01382*

DECLARATION OF ASHLEY M. SIMONSEN

I, Ashley M. Simonsen, declare as follows:

1. I am a partner with the law firm Covington & Burling LLP, counsel of record for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc. I have personal knowledge of the following facts and events, and, if called as a witness, I could and would testify competently thereto.

2. Consistent with the Court’s instruction during the October 24, 2025, Case Management Conference—that no party may “file a motion . . . without meeting and conferring and lead counsel attesting that . . . it must be done,” 10/24/25 CMC Tr.—lead counsel for both Plaintiffs and Defendants in the above-captioned litigations met-and-conferred by telephone, videoconference, and email regarding Defendants’ Motion to Strike the exhibits appended to Plaintiffs’ Omnibus Opposition to Defendants’ Motions for Summary Judgment (ECF 2414-1), including holding teleconferences that included lead trial counsel for Parties on November 7, 11, and 12. Plaintiffs conceded that striking 51 of the exhibits (that were not cited anywhere in their Omnibus Opposition) was appropriate,¹ but otherwise Plaintiffs indicated that they will oppose the relief sought in Defendants’ Motion to Strike. As explained in the Motion to Strike, Defendants must file this Motion because, without relief, they (and the Court) will be required to undertake a burdensome sealing review process given the volume of exhibits needlessly appended to Plaintiffs’ Omnibus Opposition.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a Declaration of Sarah R. London, *In re Juul Labs, Inc., Marketing, Sales Practices, and Products Liability Litigation*, ECF No. 3448 (N.D. Cal. Sept. 12, 2022).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

¹ The Parties are working on a filing that would effectuate the striking or withdrawal of these exhibits.

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2 DATED: November 14, 2025

3 By: /s/ Ashley M. Simonsen
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